

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

JOHN DOE,

Plaintiff,

v.

Civil Action No. 4:22-CV-00297-O

TEXAS CHRISTIAN UNIVERSITY,

Defendant.

**PLAINTIFF JOHN DOE’S RESPONSE IN OPPOSITION TO
DEFENDANT’S MOTION FOR SUMMARY JUDGMENT**

Except for his claim to recover mental anguish as an element of damages under Title IX, Plaintiff John Doe opposes Defendant TCU’s motion for summary judgment.

As set forth more fully in the accompanying Brief in Opposition to Defendant TCU’s Motion for Summary Judgment, TCU is not entitled to summary judgment relief. In summary, TCU has failed to establish that there are no genuine issues of material fact that should be decided at trial and TCU has likewise failed to establish that it is entitled to judgment as a matter of law.

In accordance with Local Rule 56.4(b), Doe submits that the matters required under Local Rule 56.4(a) are set forth in Mr. Doe’s Brief in Opposition, which is being concurrently filed with this Response pursuant to Local Rule 7-1. Mr. Doe incorporates by reference his Brief in Opposition, the accompanying Appendix, as well as the pleadings and papers on file in this case.

Accordingly, Plaintiff John Doe requests the Court to deny Defendant TCU’s Motion for Summary Judgment except as to Mr. Doe’s claim for mental anguish damages under Title IX.

Respectfully submitted,

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Certificate of Service

The undersigned certifies that on November 21, 2022, a true and correct copy of this document was served on counsel for TCU and counsel for Jane Roe via the Court's electronic filing system, CM/ECF.

Lynne B. Frank

Lynne B. Frank